

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>V.</b>	)	<b>CASE NO: 2:06-cr-001-SRW</b>
	)	
<b>SHARON G. KUHN</b>	)	

**UNOPPOSED MOTION TO CONTINUE TRIAL**

NOW COMES the Defendant, Sharon G. Kuhn, by and through undersigned counsel, and respectfully moves this Court to continue the trial of this action from the present trial date of July 17, 2006, until a later date to allow for the consideration of pretrial diversion in this matter. In support of this Motion, defendant would show:

1. Undersigned counsel has requested Pretrial Diversion for Defendant.
2. The government is evaluating the Pretrial Diversion request.
3. It is not anticipated that the government's evaluation of this request will be completed on or before the trial date.
4. Special Assistant United States Attorney, Neal B. Frazier, does not oppose a continuance of this matter as it is necessary for an adequate review of the diversion request by the government.
5. Neither the government nor Ms. Kuhn will be prejudiced by a continuance of this matter.

WHEREFORE, Defendant prays that this Unopposed Motion to Continue Trial be granted.

Respectfully submitted,

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**  
**TN BAR NO.: 11892**  
Attorney for Sharon G. Kuhn  
Federal Defenders  
Middle District of Alabama  
201 Monroe Street, Suite 407  
Montgomery, AL 36104  
TEL: (334) 834-2099  
FAX: (334) 834-0353  
E-Mail: [Christine\\_Freeman@fd.org](mailto:Christine_Freeman@fd.org)

---

**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Kent Brunson, Esquire  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, Alabama 36104

Capt. Neal B. Frazier, Esquire  
Special Assistant U.S. Attorney  
50 LeMay Plaza South  
Maxwell AFB, AL 36112

Respectfully submitted,

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**  
**TN BAR NO.: 11892**  
Attorney for Sharon G. Kuhn  
Federal Defenders  
Middle District of Alabama  
201 Monroe Street, Suite 407  
Montgomery, AL 36104  
TEL: (334) 834-2099  
FAX: (334) 834-0353  
E-Mail: [Christine\\_Freeman@fd.org](mailto:Christine_Freeman@fd.org)